



February 1, 2019

Via Email and Fed Ex

Mr. Russell Fish  
Office of Remediation 3LC20  
U.S. Environmental Protection Agency  
1650 Arch Street  
Philadelphia, PA 19103-2029

**Subject: Quarterly Progress Report  
Honeywell International Inc.  
Delaware Valley Works  
Claymont, DE  
Docket No. RCRA 03-2011-0252CA**

Dear Mr. Fish:

On behalf of Honeywell International Inc. (Honeywell), Wood Environment & Infrastructure Solutions, Inc. (Wood), is submitting this Quarterly Progress Report for the activities conducted by Honeywell at its Delaware Valley Works (DVW) in Claymont, Delaware. This report is being submitted in accordance with the requirements outlined in Section VI (D)(3) of the Administrative Order on Consent, Docket No. RCRA 03-2011-0252CA. This report covers the period from November 1, 2018 to February 1, 2019.

**A. Identification of Site**

Honeywell – Delaware Valley Works  
6100 Philadelphia Pike  
Claymont, Delaware 19703

**B. Status of Work and Progress to Date**

- On November 13 and 14, 2018, following approval from Sunoco to access their property, Wood installed two staff gauges within Middle Creek; surveyed wells

**Wood Environment & Infrastructure Solutions, Inc.**  
751 Arbor Way, Suite 180  
Blue Bell, PA 19422-1951  
610-828-8100 office  
610-828-6700 fax  
www.woodplc.com



MW-48, MW-557, MW-558, MW-559, and MW-560 on the Sunoco property, as well as all of the existing wells on SWMU 9; and collected a synoptic round of water levels in accordance with the *RCRA Facility Investigation Phase IV Work Plan*.

- On November 21, 2018 the U.S. Environmental Protection Agency (EPA) provided remaining review comments on the October 5, 2018 *Response to EPA Comments on the RCRA Facility Investigation Phase IV Work Plan, Vapor Intrusion*, and requested submittal of a response to comments by December 21, 2018.
- On November 23, 2018 the EPA provided comments on the laboratory Standard Operating Procedures (SOPs) for Summa Canister Cleaning and Certification and Air Analysis by TO-15 which were submitted to EPA via email on September 6, 2018 and requested submittal of a revised SOP response to comments by December 23, 2018.
- On November 29, 2018 the EPA provided approval of the October 5, 2018 *Response to EPA Comments on the RCRA Facility Investigation Phase IV Work Plan, Groundwater Investigation*, and requested submittal of the revised *Groundwater Investigation Work Plan* by December 29, 2018.
- On December 14, 2018, Wood submitted to EPA the SWMU 9 Hydrogeology Summary in anticipation of a conference call between EPA, Honeywell, and Wood on December 19, 2018.
- On December 19, 2018, EPA, Honeywell, and Wood participated in a conference call to discuss the preliminary findings of the SWMU 9 geotechnical investigation, including the hydrogeology component. During that call, the submittal of the *SWMU 9 Geotechnical Investigation Report*, as well as submittals related to the *RCRA Facility Investigation Phase IV Work Plan* were discussed, and it became apparent that there was a misunderstanding regarding submittal of the work plan. It was Honeywell's/Wood's understanding that there would be one work plan that addressed both vapor intrusion and groundwater. However, EPA explained that they had expected two separate work plans, so that the completion of one task (vapor intrusion or groundwater) would not delay the completion of the other. Ultimately, EPA and Honeywell agreed that the Geotechnical Investigation Report would be submitted on January 7, 2019 and that one work plan, which included two separate schedules (vapor intrusion and groundwater) would be submitted in January 2019.
- On December 21, Wood submitted a response to EPA's November 21, 2018 remaining review comments on the *Response to EPA Comments on the RCRA Facility Investigation Phase IV Work Plan, Vapor Intrusion*. EPA replied with additional comments. Revisions were submitted on December 22, 2018.
- On December 28, 2018, EPA contacted Wood to question the method used to evaluate vapor intrusion.
- On January 3, 2018, Wood responded via email to EPA's December 28, 2018 request, explained the procedure that was used to evaluate vapor intrusion, and stated that we would submit the final work plan and proceed with the RFI upon EPA approval.

- On January 7, 2018, Wood submitted the revised Summa Canister Cleaning and Certification and Air Analysis by TO-15 to EPA.
- On January 8, 2019, Wood submitted the *Geotechnical Investigation Report* to the EPA, with a correction submitted on January 10, 2019.

**C. Difficulties Encountered During Reporting Period**

- None this period.

**D. Actions Taken to Rectify Difficulties**

- None this period.

**E. Activities Planned for Next Quarter**

- Submit *Final RCRA Facility Investigation Phase IV Work Plan* to EPA, including both vapor intrusion and groundwater.
- EPA approval of the *RCRA Facility Investigation Phase IV Work Plan*.
- EPA approval of the DVW RFI Report, BHHRA, and BERA.
- EPA approval of the SWMU 9 Corrective Measures Objectives matrix.
- EPA approval of the *SWMU 9 Data Summary Report*.
- EPA approval of the *SWMU 9 Geotechnical Investigation Report*.
- Begin implementation of the RFI Phase IV, pending EPA approval of the work plan.
- Submittal of the *90% Design Interim Measure Work Plan – Lower Sluiceway, Shoreline and Sediment*.
- Finalize submit application to DNREC for Subaqueous Lands Permit.
- Finalize and submit application for New Castle County Floodplain Permit Application.
- Finalize and submit USACE Nationwide Permit 38 application.

**F. Explanation of Any Non-Compliance**

- None this period.

**G. Discussion of Performance Evaluation of Remedial Measures**

- Not applicable.

Attached to this letter is the certification by Honeywell as required by the Administrative Order on Consent, Docket No. RCRA 03-2011-0252CA. Please contact John P. Mihalich at 610-877-6020 if you require additional information.

Sincerely,

**Wood Environment & Infrastructure Solutions, Inc.**

A handwritten signature in blue ink, appearing to read 'J. P. Mihalich', with a stylized, cursive script.

John P. Mihalich  
Associate Geologist

Attachment    Certification

cc:     Russell Fish – USEPA  
         Steve Coladonato – Honeywell  
         Nelson Johnson – Arnold & Porter  
         Rus Davis – Honeywell  
         Lawrence Matson– DNREC  
         James Wentzel, P.E. – PADEP

### **CERTIFICATION**

I certify that the information contained in or accompanying this Quarterly Progress Report is true, accurate, and complete.

As to the identified portion of this Quarterly Progress Report for which I cannot personally verify its accuracy, I certify under penalty of law that this Report and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fines and imprisonment for knowing violations.



Signature: \_\_\_\_\_

Name: Steve Coladonato

Title: Remediation Manager, Honeywell International Inc.